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SRLC

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JANUARY 20-23

**SRLC**

LOUISVILLE

Southern Republican Leadership Conference

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K.R.E.F.

April 1, 1999

Ms. Rosemary Center, Legal Counsel  
Kentucky Registry of Election Finance  
140 Walnut Street  
Frankfort, Kentucky 40601

RE: Request for Advisory Opinion - KRS 121.135

Dear Ms. Center:

I am writing pursuant to KRS 121.135, to request an Advisory Opinion on the questions set forth below on behalf of the Board of Directors of the Southern Republican Leadership Conference.

First, let me say a word about the Southern Republican Leadership Conference (SRLC). The SRLC is a regional meeting of the thirteen states that comprise the Southern region of the Republican National Committee. Our last meeting was in Biloxi, Mississippi and attracted over 1,700 delegates from the member states.

The SRLC draws national media coverage and generally brings positive media attention to the city and state that host the Conference. Previous leadership conferences have been viewed as "community events" with active participation from citizens of all walks of life. Kentucky is the Host State for our next conference, which will be held January 20-23, 2000 at the Galt House Hotel in Louisville. The 2000 SRLC is being held in Kentucky in part due to the gracious invitation of Louisville's Democratic Mayor.

In short, the Southern Republican Leadership Conference is an educational conference that is open to the public with payment of a registration fee, which covers some meals and materials costs.

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The SRLC must solicit funds to underwrite other costs incurred in putting on this major conference. These funds will be solicited in the name of the Southern Republican Leadership Conference. These funds will be deposited into a bank account separate from any fund that is used to support the election of any candidate to public office. No funds received or expended by the SRLC will be transferred to any committee account that supports the election of any candidate to public office. The SRLC will solicit the necessary funds to underwrite expenses of the Louisville Conference, therefore the Republican Party of Kentucky will be hosting the 2000 SRLC in name only.

Now to our question.

Since the 2000 SRLC is a one-time multi-state educational conference open to the public that does not appear to fall under any of the definitions in KRS 121.015, and since no SRLC funds will be used to support any candidate for public office, and since no SRLC funds will be transferred to any committee account that supports any candidate for public office, is the 2000 SRLC required to register as a committee with the Kentucky Registry of Election Finance and file campaign finance reports?

I respectfully request that you please provide me with a written Advisory Opinion pursuant to KRS 121.135 at your earliest convenience.

Thank you for your consideration of this matter.

Sincerely,



Mike Burton  
Executive Director  
2000 SRLC